

EXHIBIT A

Wallace
King
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
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October 18, 2001

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12381

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

	<u>Hours</u>
08/01/01 NAB Prepare supplemental production documents to be sent to Phillip Goad.	3.50
DB Analyzed and incorporated new documents into case files, prepared labels, files and indices.	7.50
BB Continue review and quality check of in-house CDs of production documents (.8 hrs.); cross-reference against production files and note omissions for Ms. Pelletier and draft memo of results (1.0 hrs.); review, analyze and incorporate new case documents into case files and create new files (2.8 hrs.); review new deposition transcripts and exhibits, install on server and Summation and incorporate into case files (.5 hrs.); analyze problem areas of production CDs and devise plan for correction and provide guidance and direction to Ms. Boozer for scanning additional documents onto CD (.5 hrs.).	5.60

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		<u>Hours</u>
08/01/01	CHM Analyzedepositions (4.5 hrs.); conference call with experts (1.0 hrs.); prepare response to Lowenstein re privilege documents (2.0 hrs.).	7.50
08/02/01	DB Assist Mrs. Banks with the review and copying of Grace documents in preparation for the up-coming deposition.	3.00
	TP Telephone conference with Dr. Schmiermund re site photos.	0.20
	BB Research Westlaw re update NJ Spill Compensation and Control Act and prepare additional statute binders (2.8 hrs.); review and provide guidance to litigation clerk regarding preparation of additional production documents for scanning (.4 hrs.); review, analyze, organize, coordinate and prepare new case and expert supporting documents and incorporate into case files (4.3 hrs.).	7.50
	CHM Conference call to D. Field with follow-up letter (.8 hrs.); review Mutual documents (3.5 hrs.); review Roned Realty motions (1.2 hrs.).	5.50
	NAB Load deposition ASCII disk onto server and summation (.5 hrs.); file and index deposition transcripts (2.0 hrs.); review, file, index and label case documents (5.0 hrs.).	7.50
08/03/01	BB Incorporate new documents and pleadings into files.	3.30
	NAB Review, file, index and label case documents.	7.50
	DB Assisted Mrs. Banks with the review and preparation of Grace documents in preparation for the up coming deposition.	7.50

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		<u>Hours</u>	
08/03/01	TP	Review briefs for Mr. Manuel from Weja trial related to commingled chromium and gasoline.	0.70
08/06/01	CHM	Conference with expert (.3 hrs.); prepare for Davis deposition (.8 hrs.).	1.10
	BB	Review, analyze, coordinate and prepare new pleadings for incorporation into case files (5.8 hrs.); collect and prepare pertinent documents for Mr. Marraro (2.1 hrs.); consult with Mr. Marraro and Ms. Pelletier re research (.2 hrs.); research production database and review and analyze production documents and production CDs for crucial document for Mr. Marraro (1.3 hrs.).	9.40
	NAB	Review, file, index and label case documents.	7.50
	ACZ	Discussion with B. Hughes regarding response to questions of expert Mike Holloday and call to Mike Holloday.	0.60
	AP	Draft Answer to Honeywell's Second Amended Cross-Claims.	3.50
08/07/01	MM	Office conference with Ms. Pelletier re various tasks to be completed (0.2 hrs.); search case material and produce declaration copies of Bill E. Miller, Julie Vanmiddlesworth and David Cleary and proposed order granting summary judgment on the RCRA claim and forward with cover letter to Steven German, re per Ms. Pelletier's request (1.1 hrs.); color copier at Kinko, Capitol, Hill to produce exhibits attached to the stated declaration of Julie Vanmiddlesworth (1.2 hrs.); prepare and mail package to Mr. Green from the U.S. Postal Office, Capitol Hill (0.4 hrs.); preliminary organization of recently filed motion for summary judgments, oppositions and replies	4.10

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		<u>Hours</u>
	for future review of all counsel per Ms. Pelletier's request (1.2 hrs.).	
08/07/01 CHM	Prepare motion to strike (2.2 hrs.); conference with J. Agnello (.5 hrs.); conference with plaintiffs re various issues (1.2 hrs.); conference with client (.5 hrs.).	4.40
BB	Research defendants' summary judgment brief, opposition briefs and reply brief for pertinent information for Mr. Marraro (1.0 hrs.); scan new documents and incorporate into electronic files (.8 hrs.) collect pertinent documents for Mr. Marraro for meeting with client (.2 hrs.); incorporate new correspondence and documents into indexed case files and create new files (7.8 hrs.).	9.80
AP	Draft Answer to Honeywell's Second Amended Cross-Claims (2.5 hrs.); review Honeywell Reply Brief on Summary Judgment (.5 hrs.); review prior week's correspondence (1.0 hrs.).	4.00
TP	Calls and emails with Dr. Koch, Mr. Marraro and Mr. Boenning re scheduling of deposition for Dr. Koch and arrangements to meet with her for preparation (.9 hrs.); study incoming case correspondence including Honeywell brief re Grace's late production of document re site condition (1.9 hrs.).	2.80
08/08/01 PCC	Telephone conference with Messrs. Agnello and Marraro regarding accounting issues.	0.20
CHM	All-day trial preparation meeting with J. Agnello.	9.50

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		<u>Hours</u>
08/08/01	BB	Read, coordinate, and prepare pretrial and local trial instruction materials for case attorneys. 1.30
	TP	Email to Dr. Koch re deposition location and preparation. 0.20
	MM	Review e-mail from Ms. Banks re status of case and leave coverage (.1 hrs.); continue to review and organize all filed briefs re motion for summary judgments (i.e., from 6/13; 7/10 and 7/23) into binders for future convenience, pending (4.1 hrs.). 4.20
	AP	Research sufficiency of Honeywell's RCRA allegations and draft answer. 4.10
08/09/01	ACZ	Research for P. Condron, C. Marraro on potential effect of reallocation of debt by a party on its vulnerability to corporate veil-piercing arguments by opposing parties (8.3 hrs.); draft email to P. Condron regarding results of research into corporate veil-piercing issues (.6 hrs.). 8.90
	BB	Consult with Ms. Parker re deposition preparation for expert on 8/14 and collect and prepare supporting documents for analysis (.3 hrs.); incorporate new documents into case files (.7 hrs.). 1.00
	AP	Review privileged documents and privilege log to determine whether supplemental log required (2.0 hrs.); review report of Allied hearing team (1.7 hrs.); review documents relating to Chromium toxicity (.9 hrs.); review deposition of Ted Delaney (1.4 hrs.). 6.00

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		<u>Hours</u>	
08/09/01	WH	Conferences with Messrs. Valera and Schmiermund re review/comment on their deposition transcripts and trial preparation matters (1.8 hrs.); conference with Mr. Golliday re review and comments on Dr. Brown's and Bruce James' deposition transcripts (.8 hrs.); review Bruce James' deposition transcript (3.7 hrs.); review and analyze Honeywell's Motion To Supplement Motion Record and research re opposition to same (2.6 hrs.); review recent case correspondence/pleadings (.7 hrs.).	9.60
	TP	Reviewed Koch expert report and began review of documents that she considered including Delaney report and call with Mr. Hughes re Dr. Koch's deposition preparation.	3.20
	MM	Office conferences with Ms. Pelletier re various task to be completed (.6 hrs.); continue to review and organize various case files relating to briefs, oppositions and replies recently filed (i.e., 6/13/01, 7/10/01 and 7/23/01) and create binders containing same with indexes and provided all to Ms. Pelletier as requested (7.2 hrs.); review all declarations filed recently by all parties and organize them in to a binder with index and provided all to Ms. Pelletier as requested (1.3 hrs.); case management (.8 hrs.).	9.70
	NAB	Locate and copy Walsh deposition for A. Pelletier.	0.50
	CHM	Review Walsh deposition (1.5 hrs.); prepare letter to Golden (.5 hrs.); review Mutual documents (1.5 hrs.); prepare letter to Stewart (.5 hrs.).	4.00

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		<u>Hours</u>	
08/10/01	TP	Reviewed documents relied upon by Dr. Koch in preparation for her deposition (7.6 hrs.); telephone conference with Mr. Hughes re strategy for preparation for Koch deposition (.2 hrs.); office conference with Ms. Banks re production of Koch documents and box of documents lost by federal express (.3 hrs.).	8.10
	BB	Review and prepare new deposition transcripts and install on Summation and in electronic files (.8 hrs.); assist Ms. Robinson and Ms. Parker with resolving issues with experts supporting documents for local counsel (.4 hrs.); review, prepare and incorporate supporting documents of defendants' experts into case files (2.7 hrs.); review, analyze and incorporate new case documents, pleadings and deposition transcripts and exhibits into case files (3.8 hrs.); update case calendar and forward via e-mail to case attorneys, staff and local counsel (.3 hrs.).	8.00
	WH	Conference with Mr. Marraro re status of payments to experts and trial prep matters (.6 hrs.); conferences with Mr. Nagy's staff re payment of experts (.4 hrs.); conference with paralegals re collecting expert invoices and review of same (1.7 hrs.); work on opposition to Honeywell's motion to supplement summary judgment record (2.8 hrs.); review reply brief in support of ICO's and Grace's motion for partial summary judgment on RCRA claims (.7 hrs.); confer with Mr. Davis re review of his deposition transcript and trial prep issues (.6 hrs.); review Davis' deposition transcript (3.1 hrs.).	9.90
08/11/01	CHM	Prepare for AAA depositions.	6.00

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		<u>Hours</u>
08/12/01	CHM Prepare for AAA depositions.	5.00
TP	Reviewed documents relied upon by G. Koch and briefs on issues of recovery and response cost contribution in preparation for Koch deposition.	5.10
08/13/01	TP Office conference with Mr. Hughes re documents relied upon by G. Koch in preparation for her deposition and locating particular documents to be considered in preparing Koch for deposition (.4 hrs.); e-mail with G. Koch re meeting to prepare for deposition (.1 hrs.); attorney meeting (1.7 hrs.);	2.20
PCC	Review Mr. Zacaroli's research regarding corporate veil issues (.3 hrs.); office conference with Mr. Marraro regarding veil issues (.2 hrs.); telephone conference with Messrs. Marraro and Agnello regarding veil issues (.1 hrs.).	0.60
AP	Review documents relating to chromium toxicity.	3.00
MM	Revise case calendar re e-mail from Ms. Banks.	0.10
WH	Review Brian Delaney's expert report and deposition transcript in preparation for Ms. Koch's deposition on Aug. 15th (4.2 hrs.); review new case correspondence/filings (.6 hrs.); conference with Ms. Banks re assignments (.4 hrs.); conference with Ms. Pelletier re preparing an answer to Honeywell's amended cross-claims and moving for summary judgment as to the amended claims against Grace & Co. and Grace Ltd. (.7 hrs.); review Honeywell's amended cross-claims (.6 hrs.); confer with Ms. Koch re her deposition (.8 hrs.); review Ms. Koch's documents and the	9.70

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		<u>Hours</u>
	NCP in prep for Ms. Koch's deposition (2.4 hrs.).	
08/13/01 BB	Consult with Mr. Marraro re 8/14/01 depositions and prepare materials for depositions (.5 hrs.); make call to deponent re 8/15 deposition (.1 hrs.); consult with Ms. Parker re pertinent document research CD and place call to expert re same for Ms. Parker (.1 hrs.); prepare fax with errata sheets to additional experts for Mr. Hughes and consult with Ms. Campbell re same (.1 hrs.); review record of experts review of their deposition transcripts and errata sheets and prepare summary for Mr. Hughes (3.3 hrs.); review, analyze, prepare and incorporate new correspondence and pleadings into indexed files (2.4 hrs.); collect, prepare, coordinate and organize pertinent documents for depositions (1.5 hrs.); send e-mail and consult with Mr. Hughes re 8/14 deposition preparation and 8/16 deposition (.1 hrs.); make a confirmation call to court reporter re 8/14 depositions (.3 hrs.).	8.40
CHM	Study Wells deposition (1.8 hrs.); conference call with H. McGuire (.5 hrs.); prepare June Fee Application (2.5 hrs.).	4.80
08/14/01 WH	Prepare Ms. Koch for her deposition (8.6 hrs.); site visit with Ms. Koch (1.8 hrs.).	10.40
AP	Review Honeywell's motion to supplement the record (.5 hrs.); research for opposition brief (3.8 hrs.).	4.30
BB	Respond to inquiry from case expert (.2 hrs.); prepare cover letter to case expert (.3 hrs.); collect and fax pertinent documents re reply to defendants' second amended cross-claims for Mr. Hughes (.8 hrs.); research case files,	7.00

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			<u>Hours</u>
collect and prepare documents to send to case expert in preparation for trial for Mr. Hughes and place follow-up call and e-mail re same (3.7 hrs.); research and cross-reference pertinent documents against production documents for Ms. Pelletier (2.0 hrs.).			
08/14/01	CHM	All-day deposition of AAA (9.0 hrs.); prepare deposition memo (1.2 hrs.).	10.20
	RLS	Office conference with Ms. Banks and Ms. Manago regarding document review project (.1 hrs.); conduct review of produced documents to ascertain whether a particular memorandum was produced (2.0 hrs.).	2.10
	TP	Prepared fax to B. Hughes with document for Koch deposition.	0.10
08/15/01	WH	Prepare Ms. Koch for her expert deposition (1.2 hrs.); defend Ms. Koch's deposition (6.8 hrs.); confer with Ms. Koch re her deposition and follow-up assignments (.7 hrs.); confer with Ms. Banks re collecting/reviewing Honeywell's invoices and other documents relied upon by Honeywell's NCP expert (.4 hrs.); confer with Ms. Pelletier re status of draft answer and SJ motion re claims against Grace & Co. and Grace Ltd. (.3 hrs.).	9.40
	MM	Office conference with Ms. Pelletier re producing various cases (.1 hrs.); search Lexis-Nexis and Westlaw re same (.9 hrs.); review and incorporate recent correspondence and memoranda into files and revise indexes (.7 hrs.).	1.70
	BB	Incorporate new correspondence into indexed case files and create new files (4.2 hrs.); review, organize and prepare case documents	6.30

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Hours

and create case files (1.2 hrs.); provide pertinent information re counsel of record and prepare certificate of service re reply to defendants' motion to supplement motion record for Ms. Pelletier (.4 hrs.); assist Ms. Campbell and Ms. Robinson re expert invoices (.5 hrs.).

08/15/01 AP	Call with D. Field regarding potential stipulation on RCRA claim (.2 hrs.); conference with C. Marraro and J. Agnello re manner of proceeding on RCRA claim (.6 hrs.); research connection between CERCLA/RCRA claims for letter brief to judge (5.3 hrs.).	6.10
CHM	Review expert depositions (3.6 hrs.); conference with J. Agnello re various issues (1.0 hrs.); conference with client re development issues (.5 hrs.).	5.10
08/16/01 CHM	Review expert depositions (6.5 hrs.); conference with J. Agnello re motion to strike (.3 hrs.); meeting with team re pre-trial order (2.2 hrs.).	9.00
ACZ	Discussions with B. Hughes regarding assistance in preparation of upcoming trial, including tasks needed to prepare soil contamination element of case.	0.50
RLS	Office conference with Ms. Banks (.2 hrs.); review recently produced documents and create bates labels (.5 hrs.); label newly produced documents and make a copy (.3 hrs.); compose letter to Dr. Goad enclosing recent documents for incorporation into his database (.6 hrs.); review and organize file from Ms. Banks (1.5 hrs.); label files and boxes of documents	5.80

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		<u>Hours</u>
	accordingly (2.3 hrs.); scan pictures received from Ms. Banks (.4 hrs.).	
08/16/01 WH	Conferences with Ms. Banks and Mr. Zaccaroli re organizing and analyzing Honeywell's cost documents (.8 hrs.); review same and other documents relied upon by Mr. Delaney (3.6 hrs.); legal research re NCP challenges to Honeywell's costs at the site (1.2 hrs.); review Honeywell's motion to amend record and confer with Ms. Pelletier re drafting opposition to same (1.3 hrs.); review record for documents to be used in opposition to Honeywell's motion to supplement (1.7 hrs.); confer with Ms. Koch re her review of Delaney's documents (.6 hrs.); confer with Mr. Marraro re trial prep issues (.4 hrs.).	9.60
BB	Review, analyze, organize, prepare, coordinate and incorporate new pleadings, correspondence case and expert supporting documents, deposition transcripts and exhibits into indexed case files and create new files ((10.2 hrs.); prepare case documents for litigation clerk (.6 hrs.); consult with Mr. Hughes and Mr. Kaider re Summation project for defendants' experts' supporting invoices and consult with Ms. Pelletier re results (.3 hrs.).	11.10
08/17/01 CHM	Review documents re Allied fire in Baltimore re chrome (1.2 hrs.) lengthy conference call with IT re litigation preparation on health issues (1.3 hrs.).	2.50
WH	Review Peter Deming's deposition transcript and confer with Dr. Valera re same and follow-up assignments to be used in support of related motion in limine (5.4 hrs.); confer with Mr. Marraro and Ms. Pelletier re pretrial motions and other trial prep matters (.7 hrs.);	9.20

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		<u>Hours</u>
	review Mr. Agnello's draft sanctions motions re Honeywell's entire controversy argument and provide comments on same (.8 hrs.); review and revise Ms. Pelletier's draft answer to Honeywell's amended cross-claims (2.3 hrs.).	
08/17/01 RLS	Review boxes and folders of documents received from Ms. Banks (1.5 hrs.); organize and label boxes and folders of documents (4.4 hrs.); scan recent pictures received from Dr. Chapman (1.1 hrs.).	7.00
PCC	Review motion to strike (.2 hrs.); draft memo to Mr. Marraro regarding legal basis for motion and argument (.8 hrs.).	1.00
AP	Research and draft brief in opposition to Honeywell's motion to supplement the record.	5.20
NAB	Scan correspondence onto server.	3.50
MM	Office conference with Mr. Hughes re various research projects to be completed (.2 hrs.); review recently received errata sheet from Gary R. Walter, Ph.D. and compared his revised answers against actual deposition transcript (.7 hrs.); follow-up office conference with Mr. Hughes re results of comparison and Dr. Walter's serious changes (.3 hrs.); case management (.6 hrs.).	1.90
ACZ	Review expert reports on groundwater and soil contamination issues to assist B. Hughes in preparation of contamination portion of trial.	1.30
08/19/01 WH	Review Grace's cross-claims and other pertinent document in preparation for meeting in NJ with Messrs. Marraro and Agnello re case.	2.30

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		<u>Hours</u>
08/20/01	RLS	Review and label boxes of documents received from Ms. Banks. 1.70
	CHM	Trial preparation session in NJ with J. Agnello. 8.00
	WH	Meeting with Messrs. Marraro and Agnello in Roseland, NJ re case strategy and trial prep matters (7.6 hrs.); conference with Ms. Pelletier re drafting letter to Judge Cavanaugh re motion for summary judgment on Honeywell's claims against Grace & Co. and Grace Ltd (.3 hrs.); confer with Mr. Golliday re trial prep issues (.3 hrs.). 8.20
	AP	Review cases relating to supplementation of summary judgment record and cases cited by Honeywell and finalize draft of brief in opposition. 8.30
	MM	Office conference with Ms. Pelletier re producing various correspondence for her review (.1 hrs.); review e-mail from Ms. Pelletier re same (.1 hrs.); search case material (i.e., correspondence index/correspondence binders) and produce requested correspondence to Ms. Pelletier (.3 hrs.); draft memo to Gary R. Walter, Ph.D.'s file per Mr. Hughes re his correction to his 7/10/01 deposition attaching copies of his deposition and errata sheet stating the corrections for future notice (.3 hrs.). 1.90
	TP	Read briefs re Grace's request for sanctions against Honeywell for misrepresentation related to entire controversy argument and Rhone's reply on motion to dismiss. 1.20
	NAB	Scan correspondence onto server. 7.50

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		<u>Hours</u>	
08/21/01	NAB	Locate Charles Brooks (Grace) letter to David Schottwell (NJDEP) dated 7/6/82 for A. Pelletier (1.0 hrs.); scan case correspondence to server (6.5 hrs.).	7.50
	CHM	Conference with F. Shea (.3 hrs.); revise Grace defendant's Answer to RCRA claim (1.2 hrs.); review expert depositions (3.5 hrs.).	5.00
	WH	Prepare list of defenses to Honeywell's amended cross-claims (1.3 hrs.); review and revise draft answer to Honeywell's amended claims and coordinate filing/service of same (2.8 hrs.); collect and review documents used as exhibits in fact/expert depositions in preparation for pretrial conference (4.6 hrs.).	8.70
	AP	Gather, prepare and incorporate documentary evidence into brief in opposition to motion to supplement summary judgment record (4.5 hrs.); conference with Bill Hughes re brief in opposition to motion to supplement record (.5 hrs.); conference with M. Moasser regarding cite check and filing of brief (.8 hrs.).	5.80
	MM	Office conferences with Ms. Pelletier re various tasks to be completed for up-coming filing on 8/27/01 (i.e., brief of W.R.Grace & Co., W.R.Grace, Ltd., and ECARG, Inc., in opposition to Honeywell's motion to supplement the records on summary judgment) (.3 hrs.); search case material and produce various documents to be used in stated brief (4.6 hrs.); search Grace databases re same (.6 hrs.); review brief and organize all exhibits accordingly with tabs (.2 hrs.); office conference with Mr. Marraro re search files for handwritten notes to Harry Pierson (.4 hrs.)	6.10

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		<u>Hours</u>
08/21/01	LS Office conference with Mr. Hughes re legal research (.4 hrs.); legal research re privilege waiver for consultant/expert dual role (3 hrs.).	3.40
08/22/01	AP Draft letter to Judge on issue of Honeywell's new RCRA claim.	1.50
RLS	Review and incorporate new documents received during deposition into the case file (2.3 hrs.); office conference with Ms. Manago regarding Chapman documents (.3 hrs.).	2.60
MM	Follow-up with Mr. Hughes re status of pending brief to be filed on 8/27/01 (.4 hrs.); review and re-organize various exhibits (i.e., a-j) to be attached to stated brief; office conference with Ms. Pelletier re same (1.0 hrs.).	1.40
LS	Legal research re privilege waiver for consultant/expert dual role.	6.10
CHM	Conference with plaintiffs re various issues regarding status conference (.8 hrs.); review letter from Watson Johnson Landfill (.5 hrs.); conference with Obradovic re same (.2 hrs.); conference with A. Nagy re development (.8 hrs.); review Honeywell's response to Roned summary judgment (1.2 hrs.).	3.50
TP	Reviewed recent correspondence including briefs related to Honeywell's motion to supplement record.	1.50
WH	Review selected portions of the transcript of Mr. Wong's deposition in the insurance coverage case and designate for use at trial (4.2 hrs.); review selected portions of the transcript of Mr. Walerko's first deposition in the <i>ICO</i> case and designate for use at trial (2.2 hrs.); review and collect key Honeywell/DEP	9.30

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		<u>Hours</u>
	correspondence to be used in support of NCP challenge on Honeywell's response costs at the Site (1.8 hrs.); review recent case correspondence/pleadings and confer with Ms. Banks re circulation and filing of same (.6 hrs.); review Honeywell's most recent site inspection report (.2 hrs.); confer with Ms. Banks re payment of expert invoices and follow-up tasks re same (.3 hrs.).	
08/23/01 MM	Office conference with Ms. Pelletier re status of various tasks to be completed for filing of brief (i.e., exhibits, etc.) (.1 hrs.); office conference with Mr. Hughes re producing various case material for his review in preparation of finalizing state brief (.1 hrs.); search case material and produce various documents for Mr. Hughes' review (.4 hrs.); follow-up office conference with Mr. Hughes re pending exhibits to be attached to stated brief and their particular order and any additional exhibits to be produced (.2 hrs.); search case material for additional exhibits to be produced (2.1 hrs.); telephone conference with Ms. Flax re advising her of status of brief and that all exhibits to be attached to brief were going to be sent to her via FedEx for 8/24/01 delivery and other miscellaneous case issues (.3 hrs.); prepare all exhibits (i.e., A-K) to be FedEx to Ms. Flax and forward with memorandum accordingly (.4 hrs.); case management (.7 hrs.).	3.60
KK	Prepare documents for bates labeling and copying (.7 hrs.); prepare litigation chart of cross claims for Mr. Hughes (.9 hrs.).	1.60
ACZ	Research whether and under what circumstances the summary judgment record can be reopened by a party seeking to	1.30

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		<u>Hours</u>
	supplement record (1.0 hrs.); discussions with B. Hughes regarding same (.3 hrs.).	
08/23/01 LS	Legal research re privilege waiver for consultant/expert dual role.	0.60
WH	Review transcript of Mr. Walerko's second deposition in the <i>ICO</i> case and designate for use at trial (4.2 hrs.); review transcripts of Mr. Kyles' (Parsons) depositions and designate for use at trial (4.5 hrs.); review recent case correspondence/pleadings (.3 hrs.).	9.00
AP	Review and revise draft letter to Judge regarding new RCRA claim (.5 hrs.); review Roned briefs on summary judgment (1.5 hrs.); review deposition of David Walsh (2.0 hrs.).	4.00
RLS	Continue review and preparation of Dr. Chapman documents (2.2 hrs.); prepare correspondence to Dr. Phillip Goad re new Chapman documents (.2 hrs.).	2.40
CHM	Draft opposition of motion to supplement (2.5); meeting with plaintiffs' attorneys re various issues re status conference (2.0 hrs.).	4.50
08/24/01 WH	Revise and finalize Grace's opposition to Honeywell's motion to amend the summary judgment record (5.2 hrs.); confer with Ms. Flax re filing/serving Grace's opposition brief (.4 hrs.); review Judge Cavanaugh's guidelines re preparing the pretrial order and prepare file memo summarizing same (2.6 hrs.); confer with Ms. Flax re Honeywell's opposition to Grace's sanction motion (.3 hrs.); conference with Mr. Kaider and Ms. Banks re preparing Summation database of key documents for trial (.4 hrs.).	8.90

		<u>Hours</u>
08/24/01 MM	Office conferences with Mr. Hughes, Ms. Pelletier and Mr. Marraro re searching case material and producing various documents to be used as references and as exhibits to pending brief to be filed on 8/27/01 (.4 hrs.); search Westlaw and produce case for Mr. Marraro (i.e., <u>United States v. Tarkowski</u> , 2473, 2001 WL 3888933 (7th Cir. 2001)) (.2 hrs.); forward (via fax and regular mail) correspondence to Michael Caffrey from Mr. Hughes (.1 hrs.); follow-up office conference with Mr. Hughes re status of current exhibits being used in stated brief (.2 hrs.); review and cite check stated brief per Mr. Marraro's request (1.1 hrs.); search case material and forward via fax to Ms. Flax a copy of expert report of Julio Emilio Valera to be used as exhibit I to the state brief (.3 hrs.); telephone conference with Ms. Flax re same and status of brief (.2 hrs.); review final brief received from Mr. Marraro and re-organize exhibits accordingly and fill in various dates (1.2 hrs.); review final brief with all exhibits received from Mr. Hughes and forward all to Ms. Flax via e-mail for review and filling on 8/27/01 (.4 hrs.); case management (.3 hrs.).	4.40
CHM	Several calls with Grace and Kirkland re lift automatic stay (1.5 hrs.); conference with J. Agnello re same (.3 hrs.); edit motion to Court on lifting stay (.7 hrs.); prepare for status conference (1.5 hrs.); conference with Terris Pravlik re status conference (.3 hrs.).	4.30
LS	Draft summary of legal research findings (.9 hrs.); legal research re privilege waiver for consultant/expert dual role (.2 hrs.).	1.10

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		<u>Hours</u>
08/24/01 AP	Review pretrial order requirements and model (1.0 hrs.); review depositions from Weja case forwarded by B. Hatfield (1.3 hrs.); review documents relating to chromium toxicity and site chromium levels (2.7 hrs.).	5.00
08/27/01 CHM	Attend status conference in New Jersey (3.5 hrs.); work with J. Agnello on trial preparation (4.0 hrs.); prepare memo re status conference (1.5 hrs.).	9.00
RLS	Office conference with Ms. Banks re Chapman documents (.1 hrs.); review and bates label remaining documents, including pictures (1.2 hrs.); print photographs from the scanned imagines which will be included in the mailing to Dr. Goad and Chapman (1.5 hrs.); prepare packages for Drs. Goad and Chapman (1.1 hrs.); compose letter to accompany package to Dr. Chapman (.4 hrs.); review boxes of test and reports received from Ms. Manago and properly label them (.7 hrs.); scan Langan report for Ms. Banks (.3 hrs.).	5.00
BB	Review and sort new case correspondence, pleadings and documents and incorporate into indexed case files and create new files (4.0 hrs.); consult with Mr. Hughes re trial preparation and deposition transcript corrections project (.2 hrs.).	4.20
MM	Review various case documents and incorporate into existing files according to Bates range (1.1 hrs.); office conference with Mr. Hughes re miscellaneous matters and tasks to be completed (.8 hrs.).	1.90
WH	Conferences with Ms. Flax and Mr. Marraro re status conference with Judge Cavanaugh (.7 hrs.); collect and review documents used as	9.60

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Hours

exhibits and in preparation for key fact/expert depositions in preparation for pretrial conference (5.6 hrs.); conferences with Ms. Banks re developing plan for collecting and cataloging Grace's trial exhibits (1.2 hrs.); review Gary Walter's changes to his deposition transcript and confer with Dr. Davis re same (.8 hrs.); review ASTM materials in connection with challenge to Honeywell's expert (.6 hrs.); begin preparing list of legal issues for inclusion in pretrial order (.7 hrs.).

08/28/01 MM	Office conference with Ms. Banks and Ms. Boozer re various documents to be produced from the Grace databases in connection privileged documents (.2 hrs.); search databases and produced various documents pursuant to Mr. Marraro's request (1.1 hrs.); review various binders containing privileged documents and produced copies of same (2.2 hrs.).	3.50
LS	Draft letter to opposing counsel seeking production of documents on consultant's privilege log (.5 hrs.); review Mr. Deming's deposition transcript re find testimony to support privilege waiver argument for consultant/expert dual role (.5 hrs.); office conference with Mr. Hughes re legal research (.2 hrs.); legal research re disqualification of exprt on a Daubert motion (6.0 hrs.).	7.20
DB	Assisted Mrs. Banks with the review and copying of documents.	7.50
DB	Assisted Mrs. Banks with the review and copying of documents.	7.50

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		<u>Hours</u>
08/28/01	ACZ Draft Public Records Access Act request to NJDEP for all information related to proposed human health values developed by the state from Chrome VI.	1.30
BB	Research case database and records for pertinent documents for Mr. Hughes in re for pretrial order preparation, prepare and create file for Mr. Hughes (1.2 hrs.); research production and privilege documents databases and pull documents re case witness for Mr. Marraro (3.3 hrs.); coordinate, organize and prepare same witness files for Mr. Marraro (2.7 hrs.); prepare cover letter and boxes of documents relied upon by defendants' expert for Mr. Hughes and ship to case expert for review (.5 hrs.).	7.70
WH	Review Honeywell's written responses to Rule 30(b)(6) deposition questions and Mr. Walter's written responses to deposition questions (1.3 hrs.); meeting with Mr. Marraro re status conference with Judge Cavanaugh and follow-up tasks/assignments (.8 hrs.); prepare letter to Mr. Caffrey re allegedly privileged documents withheld by Honeywell's testifying expert and conduct legal research in support of same (1.6 hrs.); work on lists of disputed and undisputed facts for pretrial order (3.1 hrs.); collect and review additional documents for use as trial exhibits and inclusion in pretrial order (1.7 hrs.); review recent case correspondence and filings (.4 hrs.).	8.90
08/29/01	LS Legal research re disqualification of expert on a Daubert motion.	2.10
WH	Confer with Dr. Valera re facts/opinions needed to support motion in limine (.3 hrs.); legal research re <i>Daubert</i> standard applied by	8.80

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		<u>Hours</u>
	Third Circuit and NJ District Courts (1.8 hrs.); confer with Ms. Sneed re additional legal research on <i>Daubert</i> issue (.4 hrs.); review model <i>Daubert</i> briefs from other cases and begin drafting motion in limine re expert opinions (3.6 hrs.); confer with Ms. Banks re her progress in collecting trial exhibits and issues related to same (.4 hrs.); work on collecting key documents for inclusion in Summation database for use at trial (1.7 hrs.); review new case correspondence/pleadings (.3 hrs.).	
08/29/01 BB	Collect and prepare pertinent documents and information for Mr. Hughes (.5 hrs.); review, analyze, organize and prepare new correspondence, pleading and case documents and incorporate into indexed case files (3.8 hrs.); respond to inquiry from case expert (.5 hrs.).	4.80
NAB	Scan case correspondence and pleadings to server.	6.00
AP	Review Golder report and documents relating to site cap and liner repair (1.6 hrs.); conference with B. Banks and T. Manago regarding invoice documents (1.0 hrs.).	2.60
CHM	Interview various witnesses in New York (6.5 hrs.); prepare interview notes (1.0 hrs.).	7.50
MM	Review, organize and bind various pleadings and distribute to team members (.4 hrs.); office conference with Ms. Boozer re pleadings for binders (1.5 hrs.).	1.90
08/30/01 MM	Review various case documents and incorporate into files (1.8 hrs.); review all briefs and declarations by Grace and	3.00

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			<u>Hours</u>
Honeywell and provide copies to Mr. Hughes, Ms. Banks and for central files (1.2 hrs.).			
08/30/01	NAB	Scan case correspondence and pleadings to server.	4.00
	DB	Assisted Mrs. Banks with the review and copying documents.	7.50
	WH	Finish reviewing Mr. Deming's transcript (3.2 hrs.); confer with Ms. Sneed re status of her legal research (.3 hrs.); review relevant cases on Daubert issue (.7 hrs.); work on collecting key documents for inclusion in Summation database for use at trial (1.9 hrs.); work on preparing list of disputed and undisputed facts for inclusion in daft pretrial order (3.3 hrs.).	9.40
	BB	Review, analyze, organize and prepare new correspondence, pleadings, and case documents and incorporate into indexed case files (5.8 hrs.); make calls to client to consult on case experts and e-mail client and Mr. Hughes (.2 hrs.); cross reference expert invoice summary entries against expert invoices (.8 hrs.); consult with Mr. Hughes, Ms. Campbell and Ms. Kelley re compilation and analyses of case expert invoices and summary chart (.5 hrs.).	7.30
08/31/01	SRW	Research news regarding The Passaic River Restoration Initiative and its impact on cleanup of the Hackensack River.	8.80
	WH	Conference with Mr. Marraro and Ms. Pelletier re tasks/assignments for trial prep and preparation of pretrial order (.7 hrs.); finalize list of legal issues for pretrial order for review/comment by Mr. Marraro (1.3 hrs.); revise list of disputed facts for pretrial order (1.3 hs.); review Ms. Koch's (Grace NCP	7.70

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		<u>Hours</u>
expert) deposition transcript (3.8 hrs.); collect and review additional exhibits for inclusion of pretrial order (.5 hrs.).		
08/31/01 AP	Review D.N.J. standard jury instructions (2.0 hrs.); conference with C. Marraro and B. Hughes regarding pre-trial preparation (.9 hrs.); review and revise pre-trial list of legal issues (1.2 hrs.).	4.10
BB	Analyze expert invoice documentation and cross reference against draft summary chart (2.7 hrs.); discuss details of results of review of expert invoice documents with Ms. Campbell (.5 hrs.); respond to follow-up telephone call from Mr. Hughes (.1 hrs.); consult with Ms. Pelletier re preparation for review of documents for trial exhibits (.1 hrs.); prepare revised charge of post petition expert invoices and e-mail follow-up message to client (1.8 hrs.); collect and organize documents for trial exhibits (.7 hrs.); follow-up with expert re requested deposition signature pages (.5 hrs.).	6.40
LS	Legal research re disqualification of expert on a Daubert motion.	3.20
CHM	Review Sediment Sampling Plan and conference with Dr. Goad re same (1.6 hrs.); prepare fee applications for June, July (2.0 hrs.); conference call with J. Agnello (.5 hrs.).	4.10
		<u>Amount</u>
Total Fees		702.30
8/31/2001 Less Deduction of 40% of Fees Per Agreement		\$161,727.50 (\$64,691.00)
Balance Due		<hr/> <hr/> <hr/> \$97,036.50

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Timekeeper Summary

Name	Hours	Rate
Barbara Banks, Paralegal	109.10	130.00
Darlene Boozer, Legal Clerk	40.50	95.00
Natasha A. Bynum, Legal Clerk	55.00	95.00
Peter C. Condron, Counsel	1.80	335.00
William Hughes, Counsel	158.60	305.00
Keith Kaider, Paralegal	1.60	130.00
Christopher H. Marraro, Partner	120.50	420.00
Mahmoude Moasser, Paralegal	49.40	130.00
Tamara Parker, Associate	25.30	260.00
Angela Pelletier, Associate	67.50	200.00
Letta Sneed, Associate	23.70	215.00
Reilly L. Smith, Paralegal	26.60	115.00
Sean R. Ward, Associate	8.80	165.00
Alec C. Zaccaroli, Associate	13.90	185.00

Wallace
King
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

October 18, 2001

W. R. Grace & Co.
Attention: William Corcoran
Vice President-Public & Regulatory Affairs
7500 Grace Drive
Columbia, MD 21044

Invoice #12382

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>
08/01/01	CHM Review articles re Libby (.5 hrs.); conference with R. Fabricant (.5 hrs.).	1.00
08/03/01	CHM Meeting with D. Cleary in South Carolina.	5.00
08/07/01	CHM Review numerous articles from W. Corcoran (.5 hrs.); conference with Dr. Goad (.6 hrs.).	1.10
08/09/01	CHM Review articles from J. Davis.	0.50
08/22/01	CHM Review articles (.5 hrs.); meeting with D. Cleary (1.0 hrs.).	1.50
08/28/01	RM Review correspondence and separate accordingly and confer with Ms. Banks re same.	0.50
	CHM Review articles (.8 hrs.); conference with J. Spinello re rescheduling of meeting (1.2 hrs.); review 7th Circuit case on pre-enforcement review and e-mail to W. Corcoran (.8 hrs.).	2.80

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		<u>Hours</u>	
08/29/01	RM	Review Libby, Montana asbestos correspondence (.2 hrs.); set up case files and file accordingly (.4 hrs.); create case index (.2 hrs.).	0.80
	RM	Review correspondence and update case files accordingly.	0.40
	CHM	Conference with W. Corcoran (.3 hrs.); review Libby newspaper articles (.2 hrs.).	0.50
		<u>Amount</u>	
Total Fees		14.10 \$5,403.50	

Timekeeper Summary

Name	Hours	Rate
Christopher H. Marraro, Partner	12.40	420.00
Rebecca Mitchell, Paralegal	1.70	115.00



WALLACE KING MARRARO & BRANSON, PLLC
 1050 THOMAS JEFFERSON STREET, N.W.
 WASHINGTON, DC 20007
 Phone 202.204.1000
 Fax 202.204.1001

October 18, 2001

W. R. Grace & Co.
 Attention: Lydia Duff, Esq.
 7500 Grace Drive
 Columbia, MD 21044

Invoice #12384

For Professional Services Rendered In Connection with Waterloo - Brewer Road Site - Matter 4

Professional Services:

		<u>Hours</u>
08/08/01	BB Review new pleadings, correspondence and documents, incorporate into indexed case files and create new case files.	2.90
BB	Respond to telephone request from Mr. Hughes and place call to case witness for Mr. Hughes.	0.30
08/16/01	BB Prepare letter to case witness and make follow up call to same for Mr. Hughes.	0.30
		<u>Amount</u>
		3.50 \$455.00

Timekeeper Summary

Name	Hours	Rate
Barbara Banks, Paralegal	3.50	130.00

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King
Marraro
Branson

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1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

October 18, 2001

W. R. Grace & Co.
Attention: Lydia Duff, Esq.
7500 Grace Drive
Columbia, MD 21044

Invoice #12383

For Professional Services Rendered in Connection with the Motor Wheel Site - Matter 5

Professional Services:

	<u>Hours</u>
08/07/01 RM Review websites and email Mr. Marraro Third Circuit home page information (.4 hrs.); confer with Ms. Banks re same (.1 hrs.).	0.50
08/10/01 CHM Study 3rd Circuit opinion; conference call with D. Cleary; conference call with R. Oslan and others.	1.50
RM Review opinion from court (.2 hrs.); email Ms. Pelletier re same (.1 hrs.); confer with Ms. Manago, Ms. Wiltshire, Ms. Banks and Mr. Kaider re same (.3 hrs.).	0.60
AFK Review Court of Appeals opinion (1 hrs.); office conference with Mr. Dorsen re same (.1 hrs.); telephone conferences with Messrs. Marraro and Kampman re same (.1 hrs.).	1.20
08/13/01 ACZ Review Court of Appeals decision in <i>U.S. v. Motorwheel</i> and provide and explain decision to BNA legal editor.	0.40

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		<u>Hours</u>	
08/13/01	CHM	Conference with Obradovic, Ito, Perdfomo, and Yeager re 3rd Circuit opinon (1.2); prepare memo to client re same.	1.80
08/14/01	ACZ	Additional discussions with BNA legal editor regarding Motorwheel ruling.	0.30
08/15/01	DD	Research award of costs against EPA.	0.30
08/16/01	RM	Get assignment from Ms. Pelletier (.2 hrs.); confer with Ms. Rupp and Mr. Pelton re copy costs (.3 hrs.); review pleadings and create chart of costs for briefing for Bill of Costs (1.2 hrs.); confer with Ms. Pelletier (.2 hrs.).	1.90
	BB	Review pleadings, FRAP 39 and LAR and draft affidavit for Ms. Pelletier and itemized statement for bill of costs (1.0 hrs.); confer with Ms. Pelletier and Mr. Pelton re same (.8 hrs.).	1.80
08/17/01	RM	Email attorneys and paralegal re previous Bill of Costs to use as guideline (.1 hrs.); confer with Ms. Manago and Ms. Sneed re same (.2 hrs.); review materials on G drive for outline to follow (.5 hrs.).	0.80
08/21/01	AP	Prepare application for costs to be submitted to 3rd Circuit.	1.00
	RM	Review pleadings, FRAP 39 and LAR and draft affidavit for Ms. Pelletier and Itemized Statement for Bill of Costs (2.0 hrs.); confer with Ms. Pelletier and Mr. Pelton re same (.2 hrs.).	2.20
08/22/01	RM	Review pleadings and correspondence and email Ms. Pelletier re filing and docketing fees (.5 hrs.); draft cover letter to clerk (.2 hrs.).	0.70

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			<u>Hours</u>
08/23/01	AP	Review local rules regarding Bill of Costs and research recoverable costs (1.1 hrs.); conference with R. Mitchell regarding preparation of filing (.3 hrs.); draft and sign Affidavit regarding calculation of costs (1.0 hrs.); review and finalize Bill of Costs (.2 hrs.).	2.60
	RM	Prepare and file Bill of Costs (1.5 hrs.); confer with Ms. Pelletier re same (.2 hrs.).	1.70
08/28/01	RM	Review correspondence and separate accordingly and confer with Ms. Banks re same.	0.40
08/29/01	RM	Review pleadings and correspondence and attorney notes and research and update case files accordingly.	1.20
08/31/01	CHM	Review fee filing in 3rd Circuit.	0.20
			<u>Amount</u>
Total Fees			21.10 \$4,258.50

Timekeeper Summary

Name	Hours	Rate
Barbara Banks, Paralegal	1.80	130.00
David Dorsen, Counsel	0.30	350.00
Anthony F. King, Partner	1.20	375.00
Christopher H. Marraro, Partner	3.50	420.00
Rebecca Mitchell, Paralegal	10.00	115.00
Angela Pelletier, Associate	3.60	200.00
Alec C. Zagaroli, Associate	0.70	185.00